



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI
GOVERNOR

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COMMISSIONER

**Interstate Brands Corporation
York County
Biddeford, Maine
A-732-71-F-R (SM)**

**Departmental
Findings of Fact and Order
Air Emission License**

After review of the air emissions license application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., §344 and §590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

Interstate Brands Corporation (IBC) located in Biddeford, Maine has applied to renew their Air Emission License permitting the operation of emission sources associated with their bakery.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (scf/hr)	Fuel Type, % sulfur	Stack #
Boiler #1	8.4	8,400	NG or propane, negligible	A
Boiler #2	8.4	8,400	NG or propane, negligible	A
Make-up Air #1	5.0	5,000	NG or propane, negligible	--
Make-up Air #2	5.0	5,000	NG or propane, negligible	--
Make-up Air #3	5.0	5,000	NG or propane, negligible	--
Make-up Air #4	5.0	5,000	NG or propane, negligible	--
Make-up Air #5	5.0	5,000	NG or propane, negligible	--
Make-up Air #6	10.0	10,000	NG or propane, negligible	--
Make-up Air #7	10.0	10,000	NG or propane, negligible	--
Make-up Air #8	3.0	3,000	NG or propane, negligible	--
Make-up Air #9	5.4	5,400	NG or propane, negligible	--

AUGUSTA

17 STATE HOUSE STATION
AUGUSTA, MAINE 04333-0017
(207) 287-7688 FAX: (207) 287-7826
RAY BLDG., HOSPITAL ST.

BANGOR

106 HOGAN ROAD
BANGOR, MAINE 04401
(207) 941-4570 FAX: (207) 941-4584

PORTLAND

312 CANCO ROAD
PORTLAND, MAINE 04103
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE

1235 CENTRAL DRIVE, SKYWAY PARK
PRESQUE ISLE, MAINE 04769-2094
(207) 764-0477 FAX: (207) 760-3143

Process Equipment

Equipment	Maximum Capacity (MMBtu/hr)	Maximum Firing Rate (CF/hr)	Fuel Type	Production Rate (ton/hr)	Pollution Control Equipment	Stack #
Bread Oven #1	9.2	9,200	natural gas	8.2	catalytic oxidizer #1	O1
Bread Oven #2	7.6	7,600	natural gas	8.9	catalytic oxidizer #2	O2
Bun Oven	6.9	6,900	natural gas	4.4	catalytic oxidizer #2	O2
Cake Line Oven	3.3	3,300	natural gas	--	none	CO
Pan Washer/Dryer	2.5	2,500	natural gas	--	none	--

IBC previously licensed the operation of an English Muffin Griddle and two Donut Fryers. This equipment is no longer in operation and has been removed from the facility.

Miscellaneous Equipment and Sources

Two Parts Washers
Chain Lubricating Oil
Videojet Printer Ink

IBC has additional equipment including a diesel storage tank and maintenance activities which are considered insignificant activities and are mentioned here for completeness purposes only.

C. Application Classification

The application for IBC does not include the licensing of increased emissions or the installation of new or modified equipment. Therefore, the license is considered to be a renewal of current licensed emission units only and has been processed through *Major and Minor Source Air Emission License Regulations*, 06-096 CMR 115 (last amended December 24, 2005). With the facility wide fuel limit and facility wide VOC emission limit, the facility is licensed below the major source thresholds and is considered a synthetic minor.

II. BEST PRACTICAL TREATMENT (BPT)

A. Introduction

In order to receive a license the applicant must control emissions from each unit to a level considered by the Department to represent Best Practical Treatment (BPT), as defined in *Definitions Regulation*, 06-096 CMR 100 (last amended December 24, 2005). Separate control requirement categories exist for new and existing equipment as well as for those sources located in designated non-attainment areas.

BPT for existing emissions equipment means that method which controls or reduces emissions to the lowest possible level considering:

- the existing state of technology;
- the effectiveness of available alternatives for reducing emissions from the source being considered; and
- the economic feasibility for the type of establishment involved.

B. Process Description

IBC operates a bakery which consists of two high speed bread lines, a high speed bun line, cake oven, nine make-up air heaters, a pan washer/dryer, and two gas/propane fired boilers. Fugitive emission sources include videojet printers.

The boilers provide heat and hot water to the facility and steam for production use. Bakery production equipment includes both yeast and chemically leavened product lines.

Ethanol, a VOC, is produced as a result of baking yeast-leavened breads, where yeast metabolizes with sugars in an anaerobic fermentation producing ethanol. Ethanol remains in a liquid state in the bread through the prebaking process, and when exposed to high temperatures through baking, ethanol vapor is emitted from the bread. The chemically leavened products have no ethanol production and no significant VOC emissions.

C. Boilers

Boilers #1 and #2 each have a maximum design heat input capacity of 8.4 MMBtu/hr and fire natural gas with propane as backup.

Boilers #1 and #2 each have maximum heat inputs less than 10 MMBtu/hr and are therefore not subject to the New Source Performance Standards (NSPS) Subpart Dc for steam generating units greater than 10 MMBtu/hr manufactured after June 9, 1989.

A summary of the BPT analysis for Boilers #1 and #2 is the following:

1. The total fuel use for the facility shall not exceed 300 million scf/year of natural gas (or equivalent propane), based on a thirteen 4-week rolling total.
2. *Fuel Burning Equipment Particulate Emission Standard*, 06-096 CMR 103 (last amended November 3, 1990) regulates PM emissions, however in this case a BPT analysis for PM determined a more stringent limit of 0.05 lb/MMBtu was appropriate and shall be used. The PM₁₀ limits are derived from the PM limits.
3. NO_x, CO and VOC emission limits are based upon AP-42 data dated 2/98.
4. Visible emissions from the boilers shall each not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

D. Make-up Air Handling Units

The make-up air handling units include five units at 5.0 MMBtu/hr, two units at 10.0 MMBtu/hr, one unit at 3.0 MMBtu/hr, and one unit at 5.4 MMBtu/hr which fire natural gas. The sulfur content of natural gas is negligible.

The make-up air handling units are not steam generating units. Therefore, they are not subject to NSPS Subpart Dc.

A summary of the BPT analysis for the make-up air handling units is the following:

1. The total fuel use for the facility shall not exceed 300 million scf/year of natural gas (or equivalent propane), based on a thirteen 4-week rolling total.
2. 06-096 CMR 103 regulates PM emissions, however in this case a BPT analysis for PM determined a more stringent limit of 0.05 lb/MMBtu was appropriate and shall be used. The PM₁₀ limits are derived from the PM limits.
3. NO_x, CO and VOC emission limits are based upon AP-42 data dated 2/98.
4. Visible emissions from the make-up air handling units shall each not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

E. Pan Washer/Dryer

IBC uses a small (2.5 MMBtu/hr) natural gas fired pan washer/dryer.

A summary of the BPT analysis for the pan washer is the following:

1. The total fuel use for the facility shall not exceed 300 million scf/year of natural gas (or equivalent propane), based on a thirteen 4-week rolling total.

2. The PM and PM₁₀ limits are based on an emission rate of 0.05 lb/MMBtu which is considered BACT for small natural gas fired equipment.
3. NO_x, CO and VOC emission limits are based upon AP-42 data dated 2/98.
4. Visible emissions from the pan washer/dryer shall not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

F. Production Equipment

Production equipment which utilizes natural gas includes: 9.2 MMBtu/hr and 7.6 MMBtu/hr high speed bread ovens, and a 6.9 MMBtu/hr high speed bun oven. Chemically leavened production lines which fire natural gas include a 3.3 MMBtu/hr cake oven.

The high speed ovens and cake oven are not steam generating units. Therefore, they are not subject to NSPS Subpart Dc.

VOC emissions from the chemically leavened product lines (cake oven) are negligible. Therefore, add on pollution control equipment was determined to be economically unjustified.

The significant VOC emission sources at the bakery are the two bread ovens and the bun oven. Uncontrolled emissions from the bread and bun ovens are calculated to average 75 pounds VOC per hour.

Potential uncontrolled VOC emissions are calculated at 166, 166, and 109 tons per year for bread line 1, bread line 2, and bun line, respectively. VOC emissions were calculated assuming bakery formulas similar to existing bakery products produced at another bakery owned by Interstate Brands Corporation.

IBC has installed a catalytic oxidizer system (consisting of catalytic oxidizers #1 and #2) that is capable of a destruction efficiency of 92%. Catalytic oxidizer #1 controls emissions from Bread Oven #1, has a nominal capacity of 3,200 scfm, and a burner capacity of 0.8 MMBtu/hr. Catalytic oxidizer #2 controls emissions from Bread Oven #2 and the Bun Oven, has a nominal capacity of 5,000 scfm, and a maximum burner capacity of 1.25 MMBtu/hr. An uptime of 98% for the catalytic oxidizer's parameter monitors is required at BPT.

A summary of the BPT analysis for the Bread Oven #1, Bread Oven #2, Bun Oven, and the Cake Line Oven is the following:

1. The total fuel use for the facility shall not exceed 300 million scf/year of natural gas (or equivalent propane) based on thirteen 4-week rolling totals.
2. PM and PM₁₀ limits are based upon BPT.
3. NO_x and CO emission limits are based upon AP-42 data dated 2/98.

4. IBC shall capture and control emissions from Bread Oven #1 in catalytic oxidizer #1 to achieve a destruction efficiency of 92%.
5. IBC shall capture and control emissions from Bread Oven #2 and the Bun Oven in catalytic oxidizer #2 to achieve a destruction efficiency of 92%.
6. Visible emissions from the Bread Oven #1, Bread Oven #2, Bun Oven, and Cake Line Oven shall each not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period.

G. Miscellaneous VOC Emission Sources

Fugitive VOC emissions occur from label printing of packaged goods, lubricating oil used for the oven chains, and two parts washers used in bakery maintenance and garage areas.

The parts washers at IBC use only an aqueous solution.

The label printing of packaged goods consists of the use of many small inkjet printers. Total VOC emissions from the inkjet printers is estimated to be 1.8 tons per year. BPT for VOC emissions from the inkjet printers is recordkeeping including gallons of ink, makeup fluid, and cleaning solution used indicating the percent VOC by weight.

H. Annual Emission Restrictions

IBC shall be restricted to the following annual emissions, based on a 12 month rolling total:

Total Allowable Annual Emission for the Facility
(used to calculate the annual license fee)

	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Natural Gas Firing	8.8	8.8	0.2	15.0	12.6	0.8
Process VOC	-	-	-	-	-	39.2
Total TPY	8.8	8.8	0.2	15.0	12.6	40.0

III.AMBIENT AIR QUALITY ANALYSIS

According to 06-096 CMR 115, the level of air quality analyses required for a renewal source shall be determined on a case-by case basis. Modeling and monitoring are not required for a renewal if the total emissions of any pollutant released do not exceed the following:

Pollutant	Tons/Year
PM	25
PM ₁₀	25
SO ₂	50
NO _x	100
CO	250

Based on the total facility licensed emissions, IBC is below the emissions level required for modeling and monitoring.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment,
- will not violate applicable emission standards,
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-732-71-F-R subject to the following conditions.

Severability. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

STANDARD CONDITIONS

- (1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emissions units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions (38 M.R.S.A. §347-C).

- (2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 115. [06-096 CMR 115]
- (3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both. [06-096 CMR 115]
- (4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request. [06-096 CMR 115]
- (5) The licensee shall pay the annual air emission license fee to the Department, calculated pursuant to Title 38 M.R.S.A. §353. [06-096 CMR 115]
- (6) The license does not convey any property rights of any sort, or any exclusive privilege. [06-096 CMR 115]
- (7) The licensee shall maintain and operate all emission units and air pollution systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions. [06-096 CMR 115]
- (8) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request. [06-096 CMR 115]
- (9) The licensee shall comply with all terms and conditions of the air emission license. The filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for a renewal of a license or amendment shall not stay any condition of the license. [06-096 CMR 115]
- (10) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license. [06-096 CMR 115]

- (11) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:
- A. perform stack testing to demonstrate compliance with the applicable emission standards under circumstances representative of the facility's normal process and operating conditions:
 - 1. within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions; or
 - 2. pursuant to any other requirement of this license to perform stack testing.
 - B. install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emission testing; and
 - C. submit a written report to the Department within thirty (30) days from date of test completion.
- [06-096 CMR 115]
- (12) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicate emissions in excess of the applicable standards, then:
- A. within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and
 - B. the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there were intervening days during which no violation occurred or that the violation was not continuing in nature; and
 - C. the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on an interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.
- [06-096 CMR 115]
- (13) Notwithstanding any other provisions in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for

the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement. [06-096 CMR 115]

- (14) The licensee shall maintain records of malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emissions unit itself that would affect emission and that is not consistent with the terms and conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next state working day, whichever is later, of such occasions where such changes result in an increase of emissions. The licensee shall report all excess emissions in the units of the applicable emission limitation. [06-096 CMR 115]
- (15) Upon written request from the Department, the licensee shall establish and maintain such records, make such reports, install, use and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such a manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status. [06-096 CMR 115]

SPECIFIC CONDITIONS

(16) **Boilers**

A. Boilers #1 and #2 shall fire only natural gas or propane.
[06-096 CMR 115, BPT]

B. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Equipment		PM	PM ₁₀	NO _x	CO	VOC
Boiler #1	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.42	0.42	0.84	0.71	0.05
Boiler #2	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.42	0.42	0.84	0.71	0.05

C. Visible emissions from Boilers #1 and #2 shall each not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101]

(17) **Make-up Air Handling Units**

A. All make-up air handling units shall fire only natural gas or propane.
[06-096 CMR 115, BPT]

B. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Equipment		PM	PM ₁₀	NO _x	CO	VOC
Make-up Air #1	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.25	0.25	0.50	0.42	0.03
Make-up Air #2	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.25	0.25	0.50	0.42	0.03
Make-up Air #3	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.25	0.25	0.50	0.42	0.03
Make-up Air #4	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.25	0.25	0.50	0.42	0.03
Make-up Air #5	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.25	0.25	0.50	0.42	0.03
Make-up Air #6	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.50	0.50	1.00	0.84	0.06
Make-up Air #7	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.50	0.50	1.00	0.84	0.06
Make-up Air #8	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.15	0.15	0.30	0.25	0.02
Make-up Air #9	lb/MMBtu	0.05	-	-	-	-
	lb/hr	0.27	0.27	0.54	0.45	0.03

C. Visible emissions from the make-up air handing units shall each not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101]

(18) **Yeast Leavened Process Source Emissions**

- A. Bread Oven #1, Bread Oven #2, and the Bun Oven shall fire only natural gas or propane. [06-096 CMR 115, BPT]
- B. IBC shall capture and control emissions from Bread Oven #1 in catalytic oxidizer #1 whenever Bread Oven #1 is operating except for malfunction and breakdown conditions. [06-096 CMR 115, BPT]
- C. IBC shall capture and control emissions from Bread Oven #2 in catalytic oxidizer #2 whenever Bread Oven #2 is operating except for malfunction and breakdown conditions. [06-096 CMR 115, BPT]

D. IBC shall capture and control emissions from the Bun Oven in catalytic oxidizer #2 whenever the Bun Oven is operating except for malfunction and breakdown conditions. [06-096 CMR 115, BPT]

E. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Equipment		PM	PM ₁₀	NO _x	CO	VOC
Catalytic Oxidizer #1	lb/hr	2.00	2.00	1.20	0.25	N/A
Catalytic Oxidizer #2	lb/hr	2.00	2.00	1.70	0.39	N/A

F. Visible emissions from the catalytic oxidizers shall each not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101]

G. IBC shall operate catalytic oxidizers #1 and #2 such that they each achieve a destruction efficiency of 92.0%. Compliance shall be demonstrated by stack testing of each catalytic oxidizer by December 31, 2010 and at least once per every 5 years thereafter. [06-096 CMR 115, BPT]

H. IBC shall monitor and record the following as specified, for each catalytic oxidizer:

Parameter for Catalytic Oxidizer	Monitor	Record
inlet temperature to the catalytic oxidizer	continuously	continuously
outlet temperature from the catalytic oxidizer	continuously	continuously

Each parameter monitor must record accurate and reliable data. If the parameter monitor is recording accurate and reliable data less than 98% of the source operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the parameter monitor was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction of the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions. [06-096 CMR 115, BPT]

I. IBC shall perform annual core testing of the catalyst. [06-096 CMR 115, BPT]

- J. IBC shall check temperature rise semi-annually for the highest emitting bread and/or roll variety in order to demonstrate that temperature rise is maintained as recommended by the oxidizer manufacturer. [06-096 CMR 115, BPT]
- K. The total time IBC may continue to operate during a malfunction or breakdown for Catalytic Oxidizers #1 and #2 combined shall not exceed 350 hours in any 12 month period. [06-096 CMR 115, BPT]
- L. IBC shall prepare and maintain a Compliance Assurance Monitoring Plan and a Quality Improvement Plan to maintain compliance with the provisions of this license. The CAM Plan and QIP shall be maintained on site and updated as necessary. These documents shall be provided to the Department upon request. [06-096 CMR 115, BPT]

(19) **Chemically Leavened Process Source Emissions**

- A. The Cake Oven shall fire only natural gas or propene. [06-096 CMR 115, BPT]
- B. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Equipment		PM	PM ₁₀	NO _x	CO	VOC
Cake Oven	lb/hr	0.17	0.17	0.33	0.28	0.02

- C. Visible emissions from the Cake Oven shall not exceed 20% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute block average in a continuous 3-hour period. [06-096 CMR 101]

(20) **Pan Washer/Dryer**

- A. The pan washer/dryer shall fire only natural gas or propane. [06-096 CMR 115, BPT]
- B. Emissions shall not exceed the following [06-096 CMR 115, BPT]:

Equipment		PM	PM ₁₀	NO _x	CO	VOC
Pan Washer/Dryer	lb/hr	0.13	0.13	0.25	0.21	0.01

- C. Visible emissions from the pan washer/dryer shall not exceed 10% opacity on a six (6) minute block average, except for no more than one (1) six (6) minute

block average in a continuous 3-hour period.
[06-096 CMR 101]

(21) **Facility Emissions and Fuel Use Cap**

- A. Total fuel use for the facility shall not exceed 300 million scf/year (thirteen 4-week rolling total) of natural gas or propane equivalent. [06-096 CMR 115, BPT]
- B. IBC shall not exceed a facility wide emission limit of 40.0 tons per year of VOC based on a thirteen 4-week rolling total. 06-096 CMR 115, BPT]

(22) **Record keeping**

IBC shall keep the following records:

- A. For the boilers, make-up air handling units, and production equipment, IBC shall maintain fuel use records or fuel purchase receipts (13 4-week rolling totals) for natural gas and propane indicating the quantity (scf or gallons) purchased and heat content of the natural gas and propane.
- B. Total Facility VOC
 - 1. IBC shall maintain records and calculate total facility annual VOC emissions by recording yeast leavened product production, operation of the catalytic oxidizers, annual videojet ink purchased, annual oven chain lube oil purchased, annual parts washer solvent (gallons), and natural gas purchased such that the total facility VOC emissions on a annual rolling total (13 4-week totals) do not exceed 40.0 tons per year.
 - 2. IBC shall maintain records of the date and number of hours of each malfunction or breakdown event for each oxidizer. IBC shall calculate and record uncontrolled VOC emissions for each oven during each malfunction or breakdown.
- C. Yeast Leavened Production
 - 1. IBC shall maintain records of baking production in each yeast leavened production line. Records shall include the following:
 - a. initial yeast as a percent of flour;
 - b. total fermentation time in hours (yeast action time);
 - c. yeast spike as a percent of flour;
 - d. spike time in hours;
 - e. ethanol emission factor (lbs VOC/ton product); and

- f. total amount of product produced (production in tons).
- 2. IBC shall calculate and record total yeast leavened VOC emissions (tons) every 4 weeks.

D. Catalytic Oxidizer Parameter Monitoring

- 1. For the equipment parameter monitoring (catalytic oxidizer inlet and outlet temperature) and recording, required by this license, the licensee shall maintain records of the most current six year period and the records shall include:
 - a. Documentation which shows monitor operational status during all source operating time, including specifics for calibration and audits;
 - b. A complete data set of all monitored parameters as specified in this license. All parameter records shall be made available to the BAQ upon request;
 - c. Records of the initial performance test and any subsequent test demonstrating the destruction efficiency of each catalytic oxidizer including the minimum inlet temperature to the oxidizer catalyst bed and initial destruction efficiency;
 - d. Records of annual core testing of each oxidizer's catalyst; and
 - e. Records shall be maintained of the oxidizers semi-annual temperature rise check. The semi-annual temperature rise check shall consist of testing temperature rise in the oxidizers while the highest emitting bread and/or roll variety is baking in order to demonstrate that temperature rise is maintained within an acceptable range as recommended by the oxidizer manufacturer during the initial performance test in order to maintain a 92% destruction efficiency.

E. Videojet Printer Ink

IBC shall maintain annual records of gallons of videojet printer ink, makeup fluid, and cleaning solution purchased. Records shall indicate the VOC percent by weight and total VOC emissions in tons per year.

[06-096 CMR 115, BPT]

(23) **General Process Sources**

Visible emissions from any general process source shall not exceed an opacity of 20% on a six (6) minute block average basis, except for no more than one (1) six (6) minute block average in a 1-hour period. [06-096 CMR 101]

(24) **Annual Emission Statement**

In accordance with *Emission Statements*, 06-096 CMR 137 (last amended November 8, 2008), the licensee shall annually report to the Department the information necessary to accurately update the State's emission inventory by means of:

- 1) A computer program and accompanying instructions supplied by the Department; or
- 2) A written emission statement containing the information required in 06-096 CMR 137.

Reports and questions should be directed to:

Attn: Criteria Emission Inventory Coordinator
Maine DEP
Bureau of Air Quality
17 State House Station
Augusta, ME 04333-0017 Phone: (207) 287-2437

The emission statement must be submitted as specified by the date in 06-096 CMR 137.

Interstate Brands Corporation
York County
Biddeford, Maine
A-732-71-F-R

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Departmental
Findings of Fact and Order
Air Emission License

- (25) IBC shall notify the Department within 48 hours and submit a report to the Department on a quarterly basis if a malfunction or breakdown in any component causes a violation of any emission standard (38 M.R.S.A. §605).

DONE AND DATED IN AUGUSTA, MAINE THIS 18th DAY OF March, 2009.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: James P. Bridgman
DAVID P. LITTELL, COMMISSIONER

The term of this license shall be five (5) years from the signature date above.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 9/12/08

Date of application acceptance: 9/17/08

Date filed with the Board of Environmental Protection: _____

This Order prepared by Lynn Ross, Bureau of Air Quality.

